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9 *Attorneys for Plaintiffs*

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 KATHERINE ROBLES, an individual;
13 and H.R., by and through his guardian ad
14 litem Katherine Robles,

15 Plaintiffs,

16 v.

17 CITY OF ROSEVILLE, a Municipal
18 Corporation; OFFICER DEAN RIANO,
19 in his official and personal capacity;
20 OFFICER SETH ADDINGTON, in his
21 official and personal capacity;
22 SERGEANT CHRISTOPHER
23 CIAMPA, in his official and personal
24 capacity; and DOES 1-20, inclusive,
25 individually, jointly, and severally,

26 Defendants.

1 Case No. 2:22-cv-00085-DC-SCR
2 District Judge: Hon. Dena Coggins
3 Magistrate Judge: Hon. Sean C.
4 Riordan

5 **STIPULATION TO CONTINUE
6 DEADLINES FOR EXPERT
7 DISCLOSURES, EXPERT
8 DISCOVERY, AND SUBSEQUENT
9 DATES; AND PROPOSED ORDER**

10 IT IS HEREBY STIPULATED by and between Defendants, City of
11 Roseville, Officer Dean Riano, Officer Seth Addington, and Sergeant Christopher
12 Ciampa, and Plaintiffs, Katherine Robles and H.R., by and through their respective
13 attorneys of record as follows:

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- 1 1. For months, the Parties have been engaged in extensive meet and confer
2 efforts in good faith regarding the scope of FRCP Rule 35 Examinations
3 of Plaintiff Katherine Robles.
- 4 2. After months of meet and confer efforts, the Parties reached an
5 agreement regarding the scope, date, and location for two FRCP Rule 35
6 Examinations (a physical examination and a mental examination) of
7 Plaintiff Katherine Robles.
- 8 3. These examinations took place on October 24 and 25, 2024. However,
9 due to a misunderstanding regarding the timing of the examinations,
10 Plaintiff did not complete the mental examination on October 25, 2024,
11 and a second portion of that examination has been scheduled for
12 December 11, 2024.
- 13 4. To allow sufficient time for the parties' experts to consider any results of
14 this completed examination, the Parties agree there is good cause to
15 further modify the scheduling order as follows:
 - 16 a. Deadline for Initial Expert Disclosures: January 15, 2025
 - 17 b. Deadline for Supplemental/Rebuttal Expert Disclosures: February
18 14, 2025
 - 19 c. Expert Discovery deadline: April 11, 2025
 - 20 d. All dispositive motions must be filed by: June 13, 2025

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1 IT IS SO STIPULATED.
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5 Dated: December 3, 2024

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/s/ Benjamin S. Levine

Dale K. Galipo
Benjamin S. Levine
Attorneys for Plaintiffs

Dated: December 3, 2024

PORTER SCOTT
A PROFESSIONAL CORPORATION

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/s/ William E. Camy

William E. Camy
Megan N. Boelter
Attorneys for Defendants